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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) Case No.15-CR-00212-JST
14)
Plaintiff,)
15) STIPULATION AND ~~PROPOSED~~ ORDER
v.) CONTINUING SENTENCING FROM OCTOBER
16) 2, 2015 TO NOVEMBER 6, 2015
JOSE VLADAMIR ORTIZ,)
17)
Defendant.)
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STIPULATION

Defendant Jose Ortiz (hereafter, the “Defendant”) is presently set for sentencing in the above-referenced matter on October 2, 2015. Defense counsel has raised a number of objections to the Presentence Report prepared by U.S. Probation Officer Charlie Mabie. The Government has conferred with defense counsel and believes additional time to allow for the review of and discussion regarding additional discovery may resolve one or more of the objections. In an effort to streamline sentencing, the parties hereby request additional time to investigate the possibly of resolving these objections and ask the Court to reschedule the Defendant’s sentencing to November 6, 2015. The parties have also confirmed the availability of U.S. Probation Officer Mabie on such date. Based on the good cause described above, the parties make their request to allow for effective preparation of counsel and in the interests of justice.

IT IS SO STIPULATED.

DATED: September 25, 2015

/s/

KATIE BURROUGHS MEDEARIS
Assistant United States Attorney

/s/


JOYCE LEAVITT
Counsel for Jose Ortiz

~~PROPOSED~~ ORDER

For the reasons stated by the parties, the Court finds that the aforementioned request is supported by good cause and hereby reschedules the sentencing of defendant Jose Vladamir Ortiz from October 2, 2015 to November 6, 2015.

IT IS SO ORDERED.

Dated: September 29, 2015


HONORABLE JON S. TIGAR
United States District Judge